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BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH
CAROLINA

DOCKET NO. 2005-1-E

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SO PUBLIC SERVICE
COMMISSION

IN THE MATTER OF:

Carolina Power & Light Company d/b/a
Progress Energy Carolinas, Inc.
Annual Review of Base Rates for
Fuel Costs

PETITION TO INTERVENE
BY NUCOR STEEL -
SOUTH CAROLINA

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-836 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Carolina Power & Light Company ("CP&L"), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.

2. This docket has been established to review CP&L's historical and projected fuel costs and to determine the appropriate fuel factor for the next twelve months. Nucor is concerned about the impact of CP&L's fuel costs on its rates and those of other customers. Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service

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characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage of the proceeding, Nucor has not fully determined what position it may take. In general, however, Nucor is concerned with ensuring that CP&L's fuel factor is set at the proper level.

3. Nucor's mailing address is:
Nucor Steel – South Carolina
P.O. Box 525
Darlington, SC 29532

4. Nucor is represented by the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in matters regarding electric rates and service in jurisdictions throughout the United States. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 S.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette & Ritts, P.C. has associated as local counsel the firm of Moore & Van Allen, PLLC, whose attorneys are licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to both of the undersigned firms.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

BRICKFIELD, BURCHETTE, RITTS &
STONE, P.C.

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MOORE & VAN ALLEN, PLLC

A handwritten signature in cursive script, reading "Tom Mullikin", is written over a horizontal line.

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Counsel for Nucor Steel - South
Carolina

Dated: April 8, 2005

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2005-1-E

IN THE MATTER OF:

Carolina Power & Light Company d/b/a
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CERTIFICATE OF SERVICE

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, telefax, or Federal Express on this the 11th day of April, 2005:

Florence P. Belser, Esq.
Office of Regulatory Staff
South Carolina Public Service
Commission
Post Office Box 11263
Columbia, SC 29211

Scott Elliott, Esq.
SC Energy Users Committee
Elliott & Elliott, PA
721 Olive Street
Columbia, SC 29205

Len S. Anthony, Esq.
Carolina Power & Light Company
411 Fayetteville Street Mall
P.O. Box 1551
Raleigh, NC 27602



Thomas S. Mullikin